KICKOFF MEETING MINUTES
LCP CHEMICALS SUPERFUND SITE OPERABLE UNIT 2
REMEDIAL INVESTIGATION/FEASIBILITY STUDY (RI/FS)

TO:	Robert Pope, EPA Task Order Contracting Officer's Representative
FROM:	David Traylor, HGL Project Manager
THROUGH:	Alan Rittgers, HGL CLIN2 Program Manager
DATE:	September 22, 2021
SUBJECT:	LCP Chemicals OU2 Potentially Responsible Party (PRP) Oversight – Remedial Investigation/Feasibility Study (RI/FS)) / Remedial Design (RD)
CONTRACT NO:	EPA CLIN 2 DES 68HE0318D0006
TASK ORDER:	68HE0421F0036

A project kickoff meeting for the subject task order (TO) was held by teleconference, beginning at 10:00 a.m. EDT on September 17, 2021. Attendees included personnel from EPA Region 4 and the HydroGeoLogic, Inc. (HGL) project team. These minutes were recorded by HGL and capture key points discussed.

Participants:

EPA:	Robert Pope, Task Order Contracting Officer's Representative (TOCOR) Gina Monroy, Environmental Engineer
HGL:	David Traylor, Current Project Manager John Jenkins, Transitioning Project Manager Alan Rittgers, DES CLIN 2 Program Manager Christine Prettyman, Principal Contracts Administrator Joyce Pankowicz, DES Contracts Administrator

The meeting opened with the statement that the OU1 kickoff meeting issues regarding the contract are the same. As a result, C. Prettyman and J. Pankowicz left the meeting. D. Traylor provided an introduction of J. Jenkins to the team.

R. Pope presented the EPA LCP OU2 team as follows:

- Robert Pope, Remedial Project Manager (RPM)
- Stacy Haire, Site Attorney
- Angela Miller, Community Involvement Coordinator (CIC)

As presented in the LCP OU1 kickoff meeting, P. Scully (OU1 RPM) and R. Pope (OU2 RPM) took over this Site when the previous RPM retired, and they are still getting up to speed. G. Monroy will be transitioning into the RPM role for both OUs at some point. EPA reiterated that OU1 consists of impacted marsh/wetlands and the selected remedy is dredging and capping. OU2 includes the soils impacted by the cell building processes and Site-wide groundwater and is

currently in the RI/FS phase. OU3 consists of the Site uplands not associated with the cell building areas (under a no further action Record of Decision [ROD] as of 2020).

The Site began operations in 1836 and was used by Arco (1919-1929), Georgia Power (1937-1950), Dixie Paint (1941-1955), and Allied Chemical from 1955 until purchased by LCP Chemicals in 1979. The Georgia Environmental Protection Division (GEPD) closed the facility in 1994. In 1998 Allied Signal (Honeywell) purchased the property from estate out of bankruptcy. The Site's PRPs include Allied Chemical (Honeywell) and BP. Georgia Power was a PRP but cashed out and is no longer considered a PRP. Honeywell is generally the lead PRP with limited involvement from BP.

Chlor-alkali activities in the cell buildings started with Allied Chemical and continued under LCP Chemicals until 1994. These activities created high pH conditions in groundwater in the area. The high pH (>13 in some areas) caused metals to be released into solution contaminating the groundwater. Four phases of CO_2 sparging have occurred in the cell building area to successfully reduce pH to below 10 in most of the impacted areas and in the 6 to 7 range in many areas. However, metals (including mercury) are still a problem in groundwater. Groundwater generally flows northeast and east in the cell building area. In addition to high pH, beads of mercury are present in soil beneath the cell building areas. Mercury beads are confined within the footprint of the former cell buildings and to depth of up to approximately 50 feet (top of cemented sands, which are a drinking water aquifer). There is also a smear zone from 5 to 15 feet from Arco-generated refinery wastes.

OU2 contaminants of concern (COCs) in groundwater exceeding Maximum Contaminant Levels include: mercury, arsenic, beryllium, chromium, lead, benzene, chlorobenzene, and 1,4-dichlorobenzene

COCs exceeding Tap Water Regional Screening Levels include: Naphthalene, benzo(a) anthracene, 1,2,4 trimethylbenzene, dibenzo(a,h)anthracene, and methylnaphthalene.

Honeywell has expressed the desire to redevelop the property. It is zoned Basic Industrial so remedies will be consistent with that future land use. Some end-use discussions have occurred with one being potential redevelopment as a golf course for use by the local high school, the local community college, and a program that teaches golf to disadvantaged children.

There are four NPL sites in Brunswick and there are several very active stakeholder groups in the area. The CIC works closely with the community including Congressional interests, a local Technical Assistance Grant group, local politicians, environmental justice (EJ) groups, coastal and river keeper groups, and the Glynn County Environmental Coalition.

Surrounding properties include the tidal marsh, a paper plant, and the county jail. The county detention center (jail) is at the northern end of the uplands area which is no longer considered part of the Site. Brunswick is an EJ community.

R. Pope then provided a draft schedule and iterated that the amount of background documentation is extensive. The most recent document submitted is a site characterization report that summarizes the data collected for the RI. The general schedule is:

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- 2021 – RI
- 2022 – FS
- 2022/2023 – Proposed Plan
- 2023 – ROD

The group then discussed the project schedule. The first document to be reviewed by HGL is the Draft RI coming in December. There will be a pre-RI meeting in October that HGL will attend. The RI has 45 days for review, but 45 days may not be adequate. More time can be used if needed. GEPD generally takes significant time for review. The Baseline Risk Assessment took a lot of time to review, and it will be included in the RI. EPA needs risk assessment and hydrogeology support for the RI review.

A remedial action objectives screening memorandum will be submitted for review in April 2022. EPA is requiring Honeywell to include no action and full removal via excavation and offsite disposal. Honeywell's presumptive remedy is capping with MNA which will not likely be adequate. R. Pope has engaged EPA's research center to look at innovative remedies including injecting sulfuric acid into the subsurface to convert mercury into cinnabar.

R. Pope also noted that the Site has been selected by EPA's National Review Board, so there will be EPA Headquarters involvement in the FS and ROD, adding another layer of reviews. He will likely need help with presentation materials and public meeting support for the proposed plan (PP), and potentially help with responding to community comments. The PP will likely require much longer than the standard 30-day community comment period. A ROD will follow (scheduled for 2023 but will likely be delayed to 2024).

D. Traylor asked if the Site visit could be in October when the pre-RI meeting will occur. R. Pope indicated that pre-RI meeting will be virtual. The OU1 and OU2 site visits can likely be combined in coordination with P. Scully. R. Pope would prefer the November-December timeframe.

Honeywell has been cooperative and responsive so far. Work at the Site is being done under an old administrative order. The PRP team includes Prashant Gupta as the Honeywell remediation manager and EPS Montrose is the PRP contractor. Kirk Kessler is the EPA Montrose project manager and he has worked on the Site for many years. The GEPD representative is Jim McNamara and the State engineer is Cherona Levy. The BP representative is Jim Schaeffer.

R. Pope stated that he will ask the PRP contractor to provide the recent site characterization report for HGL to review prior to the October pre-RI meeting.

D. Traylor stated that the non-sampling Health and Safety Plan and UFP-QAPP are in progress.

The meeting ended at 10:56.

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